Dear Madam

EXEMPTION FROM TAXES AND DUTIES AND APPROVAL IN TERMS OF SECTION 18A: THE ISIQALO FOUNDATION

I refer to your fax dated 11 May 2012. The name of the trust has been changed.

1. It is confirmed that on 1 December 2010 the following exemptions were approved:

1.1 the association has been approved as a public benefit organisation in terms of section 30 of the Income Tax Act, (the Act) and the receipts and accruals are exempt from income tax in terms of section 10(1)(cN) of the Act.

1.2 the public benefit organisation has been approved for purposes of section 18A(1)(a) of the Act and donations to the organisation will be tax deductible in the hands of the donors in terms of and subject to the limitations prescribed in section 18A of the Act;

1.3 donations by or to the public benefit organisation are exempt from donations tax in terms of section 56(1)(h) of the Act;

2/...
1.4 bequests or accruals from the estates of deceased persons in favour of
the public benefit organisation are exempt from the payment of estate
duty in terms of section 4(h) of the Estate Duty Act, 45 of 1955.

2. Kindly note that the relevant exemptions are subject to the following
conditions:

2.1 Annual returns of income be submitted to the Tax Exemption Unit.

2.2 The following information must be given on the tax deductible receipts
issued:

2.2.1 the reference number of the public benefit organisation, issued by
the Commissioner for the purposes of this section; (The reference
number quoted on this letter [930 034 834].)

2.2.2 the date of the receipt of the donation;

2.2.3 the name of the public benefit organisation, which received the
donation, together with an address to which enquiries may be
directed in connection therewith;

2.2.4 the name and address of the donor;

2.2.5 the amount of the donation or the nature of the donation (if not
made in cash); and

2.2.6 a certification to the effect that the receipt is issued for the purposes
of section 18A of the Income Tax Act, 1962, and that the donation
has been or will be used exclusively for the object of the public
benefit organisation concerned.

3/...
2.3 The public benefit organisation must, formally amend the founding document to comply with the provisions of section 30 of the Income Tax Act within a period of 12 months from the date hereof.

Sincerely

[Signature]
Mrs. RM Gomes
Tax Exemption Analyst
for THE COMMISSIONER SOUTH AFRICAN REVENUE SERVICE